

EXHIBIT 2

brownrudnick

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October 20, 2020

VIA EMAIL ONLY

Brian C. Walsh
Doug Alvarez
Bryan Cave Leighton Paisner LLP
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RE: In re PG&E—Rule 2004 Subpoena to PricewaterhouseCoopers (“PwC”)

Dear Messrs. Walsh and Alvarez:

As you know, this firm represents the PG&E Fire Victim Trust (“Trust”). As discussed on our last call, we have identified a number of contracts for which we request that additional documents be produced, including all associated work product, deliverables, and summaries of work performed by PwC for PG&E. Accordingly, request is made that you produce documents related to the following Contract Work Authorizations (“CWA”):

- CWA No. C8902
- CWA No. 2501470215
- CWA No. 2501541792

Please also provide Master Service Agreement No. 4400007079, as well as work product, deliverables, and summaries of work performed under PwC’s engagement letter, dated June 12, 2018, with PG&E.

Additionally, please provide an update and a date certain by which we can expect to receive a compete production of any documents intended to be produced by PwC that are still being reviewed for privilege by Cravath.

This letter is without prejudice to the Trust’s rights to seek full compliance with the Rule 2004 Subpoena to PwC, which rights are expressly reserved.



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October 20, 2020
Page 2

Please provide a response to this letter by October 23, 2020, indicating whether you will be producing the additional documents referenced above. If you would like to further discuss these issues, we will be pleased to speak with you by telephone.

Sincerely,

BROWN RUDNICK LLP

ASHLEY L. BAYNHAM